

Emily Taylor

From: Lisa May <lisa@hbm-lawfirm.com>
Sent: Saturday, December 16, 2023 2:01 PM
To: Hugh Eastwood; alexis@tahincilaw.com
Subject: Daigle Deposition

Hugh and Alexis:

As a follow up on our agreement related to documents being made available for the Daigle deposition, you will find as attachments the following:

- Daigle case notes as to P [REDACTED], B [REDACTED] and H [REDACTED]. [Bates Stamp Nos. 001-002];
- Investigator's records provided to Daigle as to P [REDACTED], B [REDACTED] and H [REDACTED]. [Bates Stamp Nos. 003-028];
- City Attorney records related to engagement correspondence with Daigle and correspondence related to receipt of Daigle Audit. [Bates Stamp Nos. 029-049];
- Daigle Audit with City Attorney marks reflecting typos. [Bates Stamp Nos. 050-095];
- Final Daigle Audit sent to City Attorney. [Bates Stamp Nos. 096-141].

These documents, with the exception of the final Daigle Audit, have been marked "Confidential-Attorney Eyes Only" in that they contain the work product of Attorney Daigle pursuant to the contractual agreement with City Attorney Sandos. The documents are the communications between City Attorney Sandos and Attorney Daigle pursuant to the terms of the contract between them. These documents are provided to facilitate the deposition of Mr. Daigle on December 28th pursuant to your subpoena and do not serve as a waiver of the work-product privilege of an attorney hired by Attorney Sandos to conduct an investigation.

I have sent a copy of these same documents to Mr. Daigle, so he is aware of our position as to his work-product and the non-waiver beyond the records provided to you as a compromise to facilitate his deposition. He is aware your focus is directed to the Williams files and that we are in agreement that since his Audit was publicly released it is no longer privileged. The documents have been provided via Dropbox and the link is: [https://www.dropbox.com/t/\[REDACTED\]](https://www.dropbox.com/t/[REDACTED])

Rebecca Overbey has confirmed her availability and arrangements for the deposition.

Best regards,

Erick H.

Lisa

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